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**TADIRAN**

COMMUNICATION SYSTEMS DIV.

July 28, 1993  
Ref.: 248/93-ye

William Caton, Secretary  
Federal Communications Commission  
1919 M Street NW, Room 222  
Washington, DC 20554  
U. S. A.

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JUL 29 1993  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Dear Mr. Caton:

Re: PR Docket N° 93-61. Automatic Vehicle Monitoring Systems

Tadiran Israel, Ltd. submits this letter as comments in the FCC's proceeding on automatic vehicle monitoring systems.

Tadiran is Israel's largest manufacturer of electronics products for communications, national defense and consumer applications. In particular, Tadiran is a developer and manufacturer of both wideband pulse ranging system equipment (LMS) for location monitoring systems, and short range automatic vehicle identification (AVI) equipment such as toll booth collection equipment. We are familiar with the technical designs and radio interference of both kinds of technologies.

It is our view that wideband pulse ranging systems and short range AVI must not share the same radio spectrum. This is because the AVI transmitters are likely to cause severe interference into the receivers of the pulse ranging systems.

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Therefore, we support the FCC's proposal in this docket to move the AVI equipment to different frequencies from those used by wideband pulse ranging systems.

In addition, we understand that one issue in the docket is whether several wideband pulse ranging systems can share the same radio spectrum. This would be highly undesirable, because it would result in much less efficient overall use of the radio spectrum. In addition, it would require each of the sharing companies to build expensive interconnected networks, and duplicate fixed facilities which are a significant factor in total system costs. The inevitable result would be to raise the cost of the service to all customers.

Therefore, we recommend that in each city, the FCC should grant only one wideband pulse ranging license on each wideband radio channel. We understand that the term used for this is "co-channel separation". We support co-channel separation.

Sincerely Yours,

Yossi Atsmon  
General Manager  
Communication Systems Div.

